

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
vs.)	
)	No. S1-4:22-CR-254 JAR
KEITH MATTHEWS,)	
)	
Defendant.)	

**DEFENDANT’S SENTENCING MEMORANDUM AND REQUEST FOR
CONSIDERATION FOR A VARIANCE**

Keith Matthews was always a talented athlete. He played football while growing up and had potential for scholarships during high school. His mother and step-father even moved to offer him better opportunities. Unfortunately and despite their efforts, football fall apart for Matthews his junior year at a new school, around the same time his mom and step-dad divorced. Having no real relationship with his biological father, Matthews took their divorce hard. His step-dad had been a father figure to him most of his life. While his step-father was a long-standing addict, the loss of his father figure in his immediate life was nonetheless devastating.

When football didn’t work out, Matthews dropped the sport senior year and started missing school and smoking more marijuana. He spent more time with friends and less with family, eventually moving out of his mom’s house. He experienced increased anxiety. While he ultimately graduated high school, his grades had suffered

and without football, his opportunities felt bleak. He began working food service jobs and using more serious drugs, leading ultimately to selling more serious drugs.

In April of 2022, he was arrested for selling fentanyl and his world changed. He was fortunate to receive an opportunity to be released on bond, but the charges were serious and became even more serious when a superseding indictment was issued. While on bond, he worked several different jobs and became a father to a baby girl. Still struggling with addiction, he maintained sobriety for a period, but relapsed and was supported by drug treatment through pretrial services. Tragically, while on bond he literally lost his step-father to a heroin overdose. Matthews is still processing this grief as he has his own life and that of his child to prioritize now.

Mr. Matthews is a 24 year old father and a high school graduate. He has never been incarcerated and has minimal criminal history (his only misdemeanor case is for marijuana and paraphernalia and should eventually be expunged). He is facing a serious prison sentence and is coming to grips with the many adult responsibilities he has, as well as his unresolved trauma and grief. He is also grappling with the tragic consequences of distributing and consuming such a serious drug as fentanyl. At a young age, with a child he loves to motivate him, and with his diploma in hand, Mr. Matthews has real potential. He will use his time incarcerated to gain skills and training to support his family and to better himself.

WHEREFORE, he respectfully asks the Court to consider a variance in this matter when determining the appropriate sentence.

Respectfully submitted,

/s/Brocca Morrison
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of November, 2023, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Lisa Yemm Epplin and Mr. Jerome McDonald, Assistant United States Attorneys.

/s/Brocca Morrison
BROCCA MORRISON
Assistant Federal Public Defender